

Draft Letter to RAC Members as of Wed 7/2/03

Dear RAC Member:

As you know, the Bureau of Land Management is considering new management approaches intended to promote better partnerships with grazing permittees, advance the long-term health and productivity of the public lands, provide for sustainable ranching and improve the BLM's business practices. The approaches under consideration comprise what the Bureau calls its Sustaining Working Landscapes (SWL) Initiative, which contains regulatory and non-regulatory components. The initiative seeks to put into action Interior Secretary Gale Norton's "Four C's principles: *consultation*, *communication*, and *cooperation*, all in the service of *conservation*. The overall objective is to improve range conditions that support "working landscapes," that is, landscapes that are economically productive and environmentally healthy.

The SWL Initiative reflects the view of BLM Director Kathleen Clarke, and that of this Administration, that the BLM should look to those closest to the land – rather than Washington, D.C. – for answers to public land issues. That is why the Bureau is actively soliciting input on this initiative from its Resource Advisory Councils (RACs), its stakeholders, and the general public.

It is our intent that the RACs have the opportunity to provide meaningful and substantive input into the development of our SWL Policy. Our initial idea was to provide a preliminary working draft of the SWL Policy to the RACs for their comment and advice. However, upon review of the public comments from the workshops and from feedback we received from RAC members at the April meeting, we have determined it would be counterproductive to present a draft policy, however preliminary, at this time. The RAC members were very clear in their desire to help develop the policy – not react to a BLM proposal. Therefore, we are not providing draft guidance to the RACs at this time. Instead, we are asking the RACs to provide us with feedback and advice on our underlying objectives and direction as well specific recommendations on policy components. To assist you in developing your recommendations and advice, we have enclosed a package of documents entitled, "Sustaining Working Landscapes – An Overview" which includes an overview of the initiative, the concept summary handed out at the April workshops, a summary of public comments received at the workshops as well as in follow-up letters and e-mails, and responses to public comments in the form of Q&A's. Hopefully this information will be of use to you in developing your recommendations.

We are seeking advice and recommendations from the RAC's in four major areas:

- Are we going in the right direction and have we identified the correct objectives? Is the process/strategy we have identified for developing the Sustaining Working Landscapes initiative on target? What else should we be doing to ensure that we develop the best and most reasonable approach to sustaining working landscapes?
- Have we adequately addressed the concerns and issues raised by the public at the April workshops and are there other issues or concerns that need to be addressed? Many of the commenters felt that the information on the concepts presented at the workshops was too vague. Do the Q&A's help in clarifying the concepts? Do we need to provide additional information? Are there other issues that need to be addressed before we develop policy guidance? The RAC meetings provide another opportunity for the public to present their concerns.

- Are there other mechanisms and policy concepts that we ought to consider to achieve the objectives of the Sustaining Working Landscapes initiative? We are very interested in any additional innovative ideas or concepts that would move us toward our goals of restoring healthy rangelands and maintaining the vitality of our ranching communities.
- Are there existing examples or potential pilot projects in your area that can be used to demonstrate effective partnerships for meeting the objectives of the Sustaining Working Landscapes initiative? We are particularly interested in projects or actions that demonstrate collaborative efforts involving permittees and lessees in the protection of threatened or endangered or special status species or their habitat? Would it be wise to conduct some pilot projects before we go forward with a final policy? Do you have any specific recommendations for pilot projects in your state or region?

Another significant change in our strategy is in the schedule for the development of final SWL policy and the relationship of the policy development effort to the grazing rulemaking process that is underway. One of the concerns we heard at both the public policy workshops as well as in follow-up comment letters was the confusion wrought by the concurrent policy and rulemaking efforts. Because several of the regulatory changes being considered would complement the policy development effort, we have decided to hold off on preparing a final policy until we have substantially completed our rulemaking process. This does not, however, decrease the urgency of getting feedback from our RACs on the policy effort. Actually, this provides us with the opportunity to examine some of our basic premises and to possibly initiate some pilot projects before we develop a final direction.

We are committed to following the principles of the Secretary's 4 C's - *consultation, communication and cooperation*, all in the service of *conservation* – in developing this policy initiative. Among other things, this means listening to the public and changing our course if necessary based on what we hear. We have heard concerns about both our direction and schedule and for these reasons we are making these changes to our strategy. However, it should be noted that the last C – that of *conservation* – continues to be our final goal. We are not compromising that goal in this modification to our strategy. Rather we are ensuring that we engage in genuine *consultation, communication and cooperation* in defining how we achieve that goal.

As noted earlier, the SWL Initiative consists of a regulatory and non-regulatory component, the latter of which you are reviewing. While the regulatory revision process of necessity moves on a separate public-input track, there will be further opportunities for public comment on the rulemaking effort. Those opportunities will occur after the BLM publishes a proposed grazing rule and related Draft Environmental Impact Statement later this year.

I greatly appreciate your giving of your time and talent in reviewing the enclosed documents. I know that your contribution, and that of your fellow RAC members, will significantly improve the BLM's work product. The BLM is convinced that the SWL Initiative, when finalized and implemented, will promote citizen-based stewardship that sustains working landscapes. This will benefit not only the BLM's grazing permittees, but all who use, enjoy, and care about our nation's public lands.

Sincerely,

[[name]]
State Director
Enclosure